



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 3:10-00163-32
)
KENNETH GADDIE) Judge Trauger
)

DEFENDANT'S MOTION FOR CONTINUANCE OF TRIAL DATE

Defendant, Kenneth Gaddie, hereby moves the Court for a continuance of the trial date in this case, which is currently scheduled for March 18, 2014. As grounds for this Motion, undersigned counsel state that they need additional time to prepare for trial, especially in view of the gravity of the charges against Defendant.

The Second Superseding Indictment charges Defendant with RICO conspiracy (Count One), a violation of 18 U.S.C. § 924(c) (Count Five), and conspiracy to use and carry firearms during and in relation to crimes of violence in violation of 18 U.S.C. § 924(o) (Count Twenty-Seven). The RICO conspiracy count carries a maximum sentence of life imprisonment. On the alleged facts of this case, a conviction on Count Five would carry a mandatory minimum sentence of ten years, and a maximum of life imprisonment. Count Twenty-Seven carries a maximum sentence of twenty years.

The Court appointed undersigned counsel to represent Defendant on January 8, 2014, upon his rendition to this District from the Northern District of Illinois, and his arraignment took place the same day. The government produced voluminous discovery materials on January 29. Undersigned counsel delivered a copy of the discovery materials to Defendant on February 6 and met with him. Defendant is being detained in the Grayson County Detention Center in Leitchfield, Kentucky, which is over a two-hour drive from Nashville.